

### REMARKS

This paper is in response to the Office Action of August 14, 2006.

Claims 1-8 and 17-20 were rejected under 35 USC § 102(b) as being clearly anticipated by Satoh et al. (US Pat. No. 5,979,475). This rejection is traversed.

Independent claims 1 and 17 were amended to recite aspects of the invention, which are not taught nor suggested by Satoh et al. Satoh et al. defines a system, as pointed out by the Examiner with reference to Figures 20A and 20B, which spray on fluids to the surface of the wafer. This spraying apparatus is different from the apparatus, as claimed, that generates a fluid meniscus between the first manifold module and the surface of the substrate. Additionally, as noted by the amendments, the manifold carrier for positioning the first manifold module is now incorporated into independent claims 1 and 17. This feature was previously presented as dependent claim 2, and the Applicants do not find any teaching in Satoh et al. regarding this element. It is therefore submitted that Satoh et al., for at least the reasons noted herein and in view of the amendments, fails to anticipate the claimed embodiments of claims 1 and 17. Accordingly, the Examiner is respectfully requested to withdraw this rejection.

It is noted that Batchelder (US 5,472,502), was cited under 35 USC § 103(a), for the features of original claim 8. It is noteworthy to mention that Batchelder's structure is substantially different from what is claimed. Batchelder defines a structure that applies a fluid that is spread by centrifugal forces, and then dries on the surface. Specifically, the Batchelder structure defines structure for applying, distributing and drying photoresist, which is used in photolithograph. It is submitted that that structure defined by Batchelder would not teach nor motivate one skilled in the art to arrive at the structure of the claimed embodiments, as the structure is fundamentally different, and for different purposes.

The Examiner also cites Japan 62-150828 in combination with Satoh et al. This rejection was directed at claim 9, which is now incorporated into claim 1. Japan '828 teaches a single head, with conduits for delivering and removing fluids from particular spots, which are *splashed* onto the wafer 1. Because Japan '828 splashes fluid onto the wafer, a meniscus defined by the claimed structure, could not be defined. Further, although Japan '828 discloses the use of ports on a single head, Japan '828 does not teach the first manifold

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module, the second manifold module, and the manifold carrier, which is not incorporated into claim 1. For at least these reasons, the Applicants traverse the combination of Japan '828 and Satoh et al., as applied.

The Examiner is respectfully requested to withdraw the rejection, as the cited art fails to teach or suggest the claimed invention, as amended.

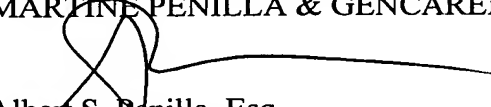
New claim 21 includes features, as discussed above, which are not taught nor suggested by the applied art. Accordingly, claim 21 is submitted to be patentable for at least the same reasons independent claims 1 and 17 are believed to be patentable.

If the Examiner wishes to discuss the remarks or needs clarification on any point, the Examiner is kindly urged to contact the undersigned by phone at (408) 749-6903.

A Notice of Allowance is respectfully requested.

If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No LAM2P475). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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